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June 7, 2018

VIA EMAIL

Michael Nadimi, Esq.
The Nadimi Law Group LLC
80 South 8th Street, Suite 900
Minneapolis, MN 55402

Michael S. Martinez
Courtney Burns
Martinez Hsu, P.C.
1601 E. Lamar Blvd., Suite 114
Arlington, TX 76011

Re: *Anastacio Lopez v. City of Minneapolis*
Court File No. 17-cv-01179-RHK-KMM

Dear Counsel:

Thank you for providing amended discovery responses and additional documents on June 1, 2018. I write to follow up on a few remaining issues.

1. The earliest paystub Mr. Lopez provided is for the pay period 11/20/16-12/3/16. The incident in question occurred on 12/1/16. Kindly provide paystubs for the two years of pay periods before the incident in question.
2. Mr. Lopez produced documents marked Amended Production000001 to Amended Production000002 showing certain purchases. It appears that many purchases are redacted. Please explain why are these purchases redacted.
3. To my knowledge, you have not provided any medical bills of any kind for treatment of Mr. Lopez. Please supplement your disclosures with all bills for treatment relating to this matter.
4. In Mr. Lopez's discovery responses, you identified Kayla and Kevin Herrera as witnesses, but provide no contact information for them and say they may be reached through your law firm. Last week on our telephone conference, you

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stated that your firm does not represent Kayla and Kevin Herrera. Does your firm represent Kayla and Kevin Herrera? If not, please provide their contact information immediately.

5. Mr. Lopez identified Mr. Nadimi as a person who has "provided a statement, signed or unsigned, oral or written, related to the Incident." Please specify to what statements by Mr. Nadimi this answer refers.
6. Mr. Lopez has not served responses to Set II of the City Defendants' Requests for the Production of Documents. Plaintiff's responses were due on May 31, 2018. Please advise when we will be receiving these responses.
7. Your client LPZ Enterprises LLC was subpoenaed for documents on May 1, 2018. The documents were due May 21, 2018. Please advise when we will be receiving these documents.

Finally, please note that the City Defendants will move to exclude any damages not described in Mr. Lopez's disclosures and not supported by evidence produced in discovery.

Very truly yours,

s/Sara J. Lathrop

Sara J. Lathrop
Assistant City Attorney

cc: Genevieve LeFevour & Kevin Pacini, Johnson & Bell, Ltd.
Donald Heeman, Daniel Robert Moses Haller, Jessica Nelson, Felhaber Larson
James W. Keeler, Jr., Christiana M. Martenson, Hennepin County Attorney Office